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Walmart Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LISA FRIEDMAN, individually,

Plaintiff,

vs.

WALMART INC., a Delaware corporation;
DOES I-V; and ROE CORPORATIONS I-V,

Defendant(s).

Case No.: 2:21-cv-01552-JCM-EJY

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DISCOVERY
DEADLINES

FIRST REQUEST

Plaintiff LISA FRIEDMAN (hereinafter “Plaintiff”) and Defendant WALMART INC. (hereinafter “Defendant” or “Walmart”), by and through their respective counsel of record, do hereby stipulate to extend the remaining deadlines in the current scheduling order and discovery plan in this matter for a period of sixty (60) days for the reasons explained herein.

Pursuant to Local Rule 6-1(b), the parties hereby aver that this is the first such discovery extension requested in this matter.

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DISCOVERY COMPLETED TO DATE

- The parties have conducted an FRCP 26(f) conference and have served their respective FRCP 26(a) disclosures;
- The parties have filed all required documents pursuant to ECF 2 to date;
- Plaintiff has provided provider specific authorizations;
- Defendant has served written discovery to Plaintiff and Plaintiff has submitted timely responses;

DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF DISCOVERY

Discovery to be completed includes:

- Plaintiff written discovery to Defendant;
- Deposition of Plaintiff;
- Depositions of Plaintiff's treating physicians;
- Depositions of fact witnesses;
- Disclosure of experts by both parties;
- Depositions of expert witnesses and rebuttal expert witnesses; and
- Plaintiff to notice Defendant's 30(b)(6) deposition.

The parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested extension. The parties agree that, pending this Court's approval, extension of remaining discovery deadlines is appropriate, as Defendant has discovered additional medical records as a result of Plaintiff's written discovery responses. Defendant is in the process of subpoenaing said records so this matter can be determined on the merit. As the deadline for expert disclosures is approaching, the parties have agreed to a 60-day discovery extension in order to ensure that meaningful discovery is conducted.

The parties have acted in good faith to request this extension and have no intent, nor reason, to delay the resolution of this matter.

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~~PROPOSED~~ **NEW DISCOVERY DEADLINES**

Last Day to Amend Pleadings or Add Parties:

Currently: December 21, 2021

Proposed: **February 21, 2022**

Expert Disclosure Deadline:

Currently: January 20, 2022

Proposed: **March 21, 2022**

Rebuttal Expert Disclosure Deadline:

Currently: February 21, 2022

Proposed: **April 22, 2022**

Discovery Cut-Off Date:

Currently: March 21, 2022

Proposed: **May 20, 2022**

Dispositive Motion Deadline:

Currently: April 20, 2022

Proposed: **June 20, 2022**

Proposed Joint Pre-Trial Deadline:

Currently: May 30, 2022

Proposed: **July 29, 2022**

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If this extension is granted, all anticipated additional discovery should be concluded within the stipulated extended deadline. The parties aver that this request for extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

DATED this 15th day of December, 2021.

ER INJURY ATTORNEYS

/s/ Justin G. Randall

JUSTIN G. RANDALL, ESQ.
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4795 South Durango Drive
Las Vegas, NV 89147

*Attorneys for Plaintiff
Lisa Friedman*

DATED this 15th day of December, 2021.

PHILLIPS, SPALLAS & ANGSTADT LLC

/s/ Latisha Robinson

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*Attorneys for Defendant
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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: December 15, 2021